

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA,)	
)	<u>FILED UNDER SEAL</u>
Plaintiff,)	
)	
v.)	NO. SA-14-CR-100-XR
)	
HECTOR JAVIER VILLARREAL)	
HERNANDEZ,)	
)	
Defendant.)	

**AGREED AND UNOPPOSED, SEALED MOTION FOR CONTINUANCE
OF SENTENCING HEARING**

Come now Hector Javier Villarreal Hernandez, Defendant, by and through his attorney of record, Michael J. Wynne, and the United States of America, by and through its attorney of record, Assistant United States Attorney Russell D. Leachman, and file this agreed and unopposed Sealed Motion for Continuance of Sentencing Hearing. For good cause, the parties would respectfully show the Court the following:

1. The docket indicates that this case is set for a sentencing hearing on March 30, 2016, at 9:30 a.m.
2. This case is extraordinarily complex, document-intensive, and involves voluminous records and tens of thousands of documents. The

case also involves complex issues of law and analysis of factual events in both the United States and Mexico.

3. As indicated in the signed and sealed plea agreement, which is on file, as part of his agreement, Defendant is required fully to cooperate with the government in connection with other investigations and cases. Those matters are ongoing, and the parties anticipate that they will remain so for some time. Defendant has been fully cooperating as instructed, but these matters are necessarily time-consuming. The parties expect that the Defendant's cooperation will have a bearing on the recommended punishment.

4. Accordingly, Defendant and the United States request a 180-day continuance of the sentencing hearing to allow for this process to continue, in the interest of justice and efficient judicial administration.

5. The undersigned has communicated with Assistant United States Attorney Russell D. Leachman, who has confirmed that the United States is not opposed, but is agreed, to this motion.

WHEREFORE, the Defendant prays that this motion for continuance be granted and that the Court continue the sentencing hearing for 180 days.

Respectfully submitted,

McDermott, Will & Emery, LLP

BY: /s/ Michael J. Wynne
Michael J. Wynne
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CERTIFICATE OF SERVICE

I certify that on this 8th day of February, 2016, a true and correct copy of the foregoing instrument was electronically-filed with the Clerk of the Court using the CM/ECF System, which will transmit notification of the filing to the following CM/ECF participant:

Attorney Name: Russell D. Leachman, AUSA

/s/ Michael J. Wynne
Michael J. Wynne
ATTORNEY FOR DEFENDANT